



Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104-2808  
+1 215 994 4000 Main  
+1 215 994 2222 Fax  
www.dechert.com

---

**MARTIN J. BLACK**

martin.black@dechert.com  
+1 215 994 2664 Direct  
+1 655 655 2664 Fax

August 4, 2016

**VIA ECF**

Hon. Cathy L. Waldor, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Mondis Technology Ltd. v. LG Electronics, Inc., et al.*  
Civil Action No. 2:15-cv-04431-SRC-CLW

Dear Judge Waldor:

In its letter of yesterday, LG states that no requests for production of documents were pending at the time of the stay. ECF # 139 at 1. In fact, LG served document requests on Mondis on July 28, 2015, and Mondis responded on August 31, 2015. Moreover, LG failed to explain that the standing Discovery Order of February 6, 2015, in the Texas case required production of all relevant documents, thus mooted the need for RFP's.

We will address our remaining points of disagreement on the call.

Respectfully submitted,

*/s/ Martin J. Black*

Martin J. Black

MJB/te

cc: All Counsel of Record (via ECF)